86-907

Supreme Court, U.S.
FILED
NOV 17 1986
JOSEPH F. SPANIOL, JR.
CLERK

No._____

IN THE

SUPREME COURT OF THE UNITED STATES

October Term, 1986

LOUIS J. ZUGER,

Petitioner,

vs.

UNITED STATES OF AMERICA,

Respondent.

PETITION FOR WRIT OF MANDAMUS TO THE CLERK AND CHIEF JUDGE OF THE UNITED STATES COURT OF APPEALS FOR THE SECOND CIRCUIT

LOUIS J. ZUGER
PETITIONER
WILKES ROAD
DANBURY, CT 06811

QUESTIONS PRESENTED

1. Whether the Clerk of the appeals court violated the "due process" and the "equal protection" clauses of the Constitution, by misapplying rules to the petitioner.

2. Whether the lower court violated the "due process" and "equal protection" clauses of the Constitution, by failing to issue appealable orders.

3. Whether the federal courts can ignore subject matter jurisdictional challenges, without violating the "due process" and "equal protection" clauses of the Constitution.

TABLE OF CONTENTS

	PAGE
Questions Presented	i
Table of Contents	ii
Table of Authorities	iii
Opinions Below	2
Jurisdiction	3
Statement of the Case	4
Reasons for Granting the Writ	8
Conclusion	11

APPENDIX INDEX

Petition for Rehearing
June 19, 1986 . . . . . A-1

Summary denial of rehearing
September 5, 1986 . . . . . A-13

Petition for Rehearing
September 10, 1986 . . . . . A-14

C.A. 2d Clerk's letter denying rehearing.
September 16, 1986 . . . . . A-16

Appellant's letter to Clerk of
C.A.2d, rejecting her premise.
September 24, 1986. . . . . A-17

Notice of Intent to petition for
mandamus, filed in C.A.2d,
October 30, 1986. . . . . A-19

TABLE OF AUTHORITIES

PAGE

LAW:

Constitution of the United States of America 3, 4, 5

Bill of Rights (Amend. 1 to 10) 5

CASES:

Dred Scott v. Sandford, 19 Howard (US) 393 5

U.S. v Kahl, 583 F.2d 1351, at 1356 . 9-10

Lott v. U.S., 280 F.2d 24 9-10

U.S. v. Andreas, 458 F.2d 491 9-10

Giordenello v. U.S., 357 U.S. 480 . . 9-10

Brushaber v Union Pacific Railroad, 240 U.S. at 16-17 10

Stanton v. Baltic Mining Co., 240 U.S. 103, at 112 10

Pollack v. Farmers' Loan & Trust Co., 158 U.S. 601 10

Flint v. Stone Tracy Co., 220 U.S. 107, at 165 10

Allgeyer v. Louisiana, 165 U.S. 578, at 589 . . . . . 5-6, 10

Tyler v. U.S., 281 U.S. 497, at 502 . . 10

Long v. Rasmussen, 281 F. 236, at 238 . 10

Economy Plumbing and Heating v. U.S., 470 F.2d 585, at 589 10

IN THE
SUPREME COURT OF THE UNITED STATES
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PETITION FOR WRIT OF MANDAMUS TO THE CLERK AND CHIEF JUDGE OF THE UNITED STATES COURT OF APPEALS FOR THE SECOND CIRCUIT

U.S.C.A., 2d DOCKET NO. 86-1116

The petitioner, LOUIS J. ZUGER, hereby petitions this Court for a writ of mandamus directed to ELAINE B. GOLDSMITH, Clerk of the United States Court of Appeals for the Second Circuit, and to IRVING R. KAUFMAN, Chief Judge of said court, directing Clerk GOLDSMITH to process the petitioner's re-rehearing petition, and for Judge

KAUFMAN to arrange for a full hearing and determination on the merits, so that an appealable order may issue from the United States Court of Appeals for the Second Circuit.

OPINIONS BELOW

NONE. The lower court failed and refused to issue an appealable order, which is why this petition for mandamus is necessary.

The lower court did, on June 6, 1986 issue some sort of statement, which ended with the following disclaimer:

"N.B. Since this statement does not constitute a formal opinion of this court and is not uniformly available to all parties, it shall not be reported, cited, or otherwise used in unrelated cases before this or any other court."

A petition for rehearing (A-1 to A-12) was filed on June 19, 1986, and was summar-

ily denied on September 5, 1986, by the Clerk (A-13).

A petition for rehearing (A-14, A-15) was filed on September 10, 1986, and the Clerk returned it, misciting Rule 40, FRAP as the excuse (A-16).

The petitioner-appellant once again attempted to obtain rehearing from the lower court, when, on September 24, 1986 he mailed his petition together with a cover letter addressed to the Clerk of the lower court (A-17, A-18). The Clerk returned same by mail.

JURISDICTION

This Court has appellate jurisdiction over the lower court under Art. III, U.S. Constitution, and may issue any writs necessary to its appellate jurisdiction. That this has never changed is evidenced in

Rule 26, 27, 27.2, Rules of the Supreme Court. The jurisdiction of this Court is invoked under Art. III, U.S. Constitution.

STATEMENT

The petitioner, LOUIS J. ZUGER, is a Free, White, Christian, Male; a citizen of the United States; an Inhabitant of Connecticut. By birth, he is possessed of certain God-given inalienable rights, as set forth in the Declaration of Independence, among which are Life, Liberty, and Property. Nor is it possible for him to have waived his inalienable rights, since he has no power or authority over God. He is the posterity for whom the Constitution of the United States of America was ordained and established. All of his rights are fully guaranteed and protected, by law, i.e. the Constitution of the United States of

America, and the first ten (10) Articles of Amendment [Bill of Rights]. It is the sworn duty of this Court to uphold said Constitution, and the rights of the petitioner. See Dred Scott v. Sandford, 19 Howard (US) 393, which has never been overturned.

The petitioner was/is engaged in a lawful, harmless and innocent occuptaion, and said occupation was not, and is not, enfranchised or licensed by either the state or federal governments.

"The right to labor and to enjoy its protection from unlawful interference is a constitutional as well as a common-law right. Every man has a natural right to the fruits of his own industry." 48 Am Jur 2d, Section 2, page 80.

"The liberty mentioned in that [14th] amendment means, not only the right of the citizen to be free from mere physical restraint of his person, as by incarceration, but the term is deemed tc embrace the right of the citizen to be free in the enjoyment of all his faculties; to be free to use them in all lawful ways; to live and work where he will; to earn his livelihood by any lawful calling; to pursue any livelihood or avocation, and for that purpose to enter into all contracts which may be proper, necessary, and essential to

his carrying out to a successful conclusion the purpose above mentioned." Allgeyer v. Louisiana, 165 U.S. 578, at 589. [A-9, 10] Certainly the petitioner, who is possessed of inalienable rights, is entitled to at least the same rights as the 14th Amendment citizen in the Allgeyer case.

On the first go-around, the petitioner was charged, by unsworn information, with having income, and failing to file income tax returns, in USA v ZUGER, N-84-21, D.C. Conn. From the very first day, he challenged the jurisdiction of the district court, and jurisdiction has never been established by any court. He was unlawfully convicted, and sentenced to incarceration at FCI Danbury.

On appeal, the U.S. Court of Appeals for the Second Circuit, in USA v. ZUGER, 84-1318, failed and refused to issue an appealable order. Instead, it issued a statement with a disclaimer, as follows:

"N.B. Since this statement does not constitute a formal opinion of this court and is not uniformly available to all parties, it shall not be reported, cited, or otherwise used in unrelated cases before this or any other court."

Rehearing was summarily denied.

On direct appeal to this Court in USA V ZUGER, 85-134, this court refused to hear the appeal for lack of jurisdiction, and summarily denied certiorari.

The petitioner herein then moved the district court to correct an illegal sentence [N-84-21 D.C. Conn.], which was denied on the basis that, because the petitioner had not accepted the jurisdiction of the district court, his motion to correct was improper.

The petitioner appealed that order, in ZUGER V. USA, 86-1116, C.A.2d., which the lower court denied, again without issuing an appealable order. The petition for rehearing [A-1 to A-12] was summarily denied [A-13].

On the one hand, the respondent has systematically refused tc address the issue of jurisdiction, pretending that the petitioner had no rights. On the other hand, because the petitioner had challenged the jurisdiction of the courts, which is his right, and which challenge has never been addressed, he is without remedy.

The petitioner would like to get on with his life, without further disruptions or interference with his rights to Life, Liberty, and Property, yet the lower courts refuse to resolve matters, which is why this writ of mandamus becomes necessary.

REASONS FOR GRANTING THE WRIT

The petitioner has the right to know what his correct status is, by law, so far as the internal revenue laws are concerned, and why it is so. It is not up to the

petitioner to make that determination, it is the responsibility of the respondent to establish petitioner's proper status, by law. None of the three (3) branches of the federal government had the courage to settle the status question, thereby denying to the petitioner "due process", "redress", and "equal protection" guaranteed by law.

It is a rule of law that subject matter jurisdiction may be challenged at any time.

U.S. v Kahl, 583 F.2d 1351, at 1356
Lott v. U.S., 280 F.2d 24
U.S. v. Andreas, 458 F.2d 491
Giordenello v. U.S., 357 U.S. 480
[A-9]

Since the petitioner's earlier challenges were never addressed or settled, the petitioner made a special attempt to challenge the subject matter jurisdiction of the lower court in sentencing him, by his petition for rehearing [A-1 to A-12]. The lower court ignored that challenge,

thereby ignoring well settled case law, such as:

U.S. v Kahl, 583 F.2d 1351, at 1356 [A-9]
Lott v. U.S., 280 F.2d 24 [A-9]
U.S. v. Andreas, 458 F.2d 491 [A-9]
Giordenello v. U.S., 357 U.S. 480 [A-9]
Brushaber v Union Pacific Railroad, 240 U.S. at 16-17 [A-6]
Stanton v. Baltic Mining Co., 240 U.S. 103, at 112 [A-6]
Pollack v. Farmers' Loan & Trust Co., 158 U.S. 601 [A-6]
Flint v. Stone Tracy Co., 220 U.S. 107, at 165 [A-7]
Allgeyer v. Louisiana, 165 U.S. 578, at 589 [A-9, 10]
Tyler v. U.S., 281 U.S. 497, at 502 [A-11]
Long v. Rasmussen, 281 F. 236, at 238 [A-11]
Economy Plumbing and Heating v. U.S., 470 F.2d 585, at 589 [A-11]

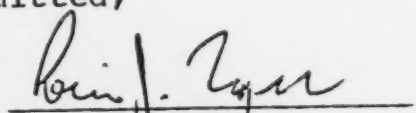
Allowing the respondent to stonewall the petitioner's efforts to learn the truth, by permitting the lower court to again refuse to issue appealable orders, would be a travesty of justice, a denial of the rights of the petitioner, and a denial of this Court's earlier decisions.

CONCLUSION

For the foregoing reasons, and others, it is respectfully urged that the petition for a writ of mandamus should be granted.

November 12, 1986

Respectfully submitted,



LOUIS J. ZUGER
Petitioner, sui juris
Wilkes Road
Danbury, CT 06811

UNITED STATES COURT OF APPEALS
FOR THE SECOND CIRCUIT

LOUIS J. ZUGER	)	
	)	
APPELLANT,	)	
	)	
vs.	)	DOCKET NO. 86-1116
	)	
UNITED STATES OF AMERICA,	)	
	)	
	)	
APPELLEE.	)	

PETITION FOR REHEARING

The appellant, LOUIS J. ZUGER, hereby petitions the court for rehearing of the above-captioned case which resulted in an order dated June 6, 1986 (A-1.1, A-1.2). The reason for rehearing is that the order of June 6, 1986 clearly misrepresents and misinterprets the appellant's position, arguments, and the law, as follows:

ORDER APPEALED

"Filed June 6, 1986."
"This cause came to be heard on the transcript of record from the United States District Court for the District of Connecticut, and was argued." (A-1.1).

"ON CONSIDERATION WHEREOF, it is now hereby ordered, adjudged, and decreed

that the judgment of said District Court be and it is hereby affirmed." (A-1.1)

"1. Zuger appeals from an order of Judge Dorsey, denying a motion to correct an illegal sentence pursuant to Fed.R.Crim.P. 35. On appeal, Zuger renews his claim that Federal reserve notes are not legal tender. Accordingly, Zuger contends that he did not owe taxes to the government, and his failure to file tax returns could not be the basis of a legitimate criminal prosecution. As noted by the district court, these claims are clearly frivolous. Congress has specifically stated that Federal reserve notes are legal tender for the purpose of paying and collecting taxes. 31 U.S.C. § 5103."(A-1.2)

"2. We have considered appellant's other claims and find them to be equally without merit." (A-1.2)

"3. Accordingly, the judgment of the district court is affirmed."(A-1.2)

POINT 1: MISINTERPRETATION OF ARGUMENT.

The court, at point 1 of the above order, clearly misunderstood, misinterpreted and misrepresented the appellant's position and argument regarding MONEY and INCOME.

The appellant never argued that Feder-

al reserve notes were not "legal tender" for the purpose of paying and collecting taxes.

What the appellant pointed out to the court was the fact that Federal reserve notes are NOT MONEY. They are obligations of the United States as per 12 U.S.C. §411.

The appellant further pointed out to the court that there is NO MONEY IN CIRCULATION [Art.I, Sec.8, Cl.5, U.S. Const.; Art.I, Sec.10, Cl.1, U.S. Constitution].

In addition, the appellant pointed out to the court that the legal definition of INCOME is a "return in MONEY from one's business, labor, or capital invested".

There being no MONEY in circulation, the appellant could not, and therefore did not, have any INCOME upon which to measure a tax.

The appellant was not subject to the "income tax laws" for the simple reason

that he could not, and therefore did not, have any INCOME. In other words, the appellant does not fall into the category of "taxpayer" as set forth in Title 26, U.S.C. His true status under the I.R. Code is that of a NONTAXPAYER.

For the court to conclude that the appellant was arguing that Federal reserve notes are not legal tender, as it did in the order of June 6, 1986, is both a misinterpretation of the appellant's arguments, and a misrepresentation of the appellant's position, arguments, and the law.

For the above reasons, it is appropriate for the appellant to suggest that this Court read the appellant's brief in this case.

POINT 2. MISREPRESENTATION OF APPELLANT'S STATUS

For the "tax years" involved in this case, the appellee's agents have misrepresented the true status of the appellant to the courts. For example:

1. The original "information" (A-2.1, A-2.2), which was not sworn to or affirmed under oath, alleges that the appellant had "gross income", which is not true.

2. However, even if the appellant did have "gross income", which he did not have, the "information" failed to state that the appellant was engaged in some activity, event, or happening which was not lawful, innocent, and harmless; which activity, event or happening was taxable for revenue purposes; and thus was subject to the "Internal Revenue laws".

3. It should not go unnoticed that the appellant did, in fact, enter several

special appearances prior to trial, for the purpose of challenging the jurisdiction of the district court over the subject matter and over the person of the appellant. Those jurisdictional challenges have never been addressed, nor has the jurisdiction of the district court ever been established.

4.It is a matter of res judicata that the income tax laws do not impose a direct tax on income. Said income taxes are indirect taxes in the nature of excise taxes.

Brushaber v Union Pacific Railroad,
240 U.S. at 16-17.
Stanton v. Baltic Mining Co.,
240 U.S. 103, at 112.
Pollack v. Farmers' Loan & Trust Co.,
158 U.S. 601.

5. It is a matter of res judicata that it is the activity, happening, or event that may be taxable for revenue purposes [excise taxes]. The nature of a revenue taxable activity is such that it cannot be

pursued as a matter of constitutional right.

Flint v. Stone Tracy Co.,

220 U.S. 107, at 165.

6. There has not been any finding of facts or conclusions of law, at any stage in the proceedings, to establish that the appellant was engaged in an activity which is taxable for revenue purposes.

In short, it has never been determined whether the appellant is, in fact, a "taxpayer" and thus subject to the internal revenue laws - or - whether the appellant is a NONTAXPAYER, who is not subject to the Internal Revenue laws. The appellee was prosecuted AS IF the appellant were a "taxpayer", without having first established his true status.

POINT 3. THE TRUE STATUS OF THE APPELLANT

The appellant was, and is, engaged in

lawfully acquiring the fruits of his labor. His activities, such as earning a living, were never licensed or franchised by either the State or Federal government, and thus the appellant does not have any licenses or franchises to pursue his lawful, harmless and innocent activities, such as earning a living. He is not subject to the I.R. Code.

The appellant believes that his status, as it relates to the Internal Revenue Code, is properly one of a NONTAXPAYER. There is nothing in the papers on file in U.S.A. v Zuger, N-84-21, D.C. Conn., which is the original case from which this case is a spinoff, that indicate findings of fact and conclusions of law to the effect that the appellant was engaged in any activity that is taxable for revenue purposes, and thus subject to the Internal Revenue Code.

The filed papers clearly evidence the fact that the appellant challenged the jurisdiction of the district court, before trial, over the subject matter, and over the appellant. Those jurisdictional challenges have never been addressed; nor had the lower court ever established jurisdiction; nor could it ever establish jurisdiction over either the person of the appellant, nor over the subject matter involved. These papers are readily available to this court, since they are contained in the appendix to appellant's brief in U.S.A. v. Zuger, 84-1318, C.A.2d Cir. See also the following cases regarding jurisdictional challenges:

U.S. v Kahl, 583 F.2d 1351, at 1356
Lott v. U.S., 280 F.2d 24
U.S. v. Andreas, 458 F.2d 491
Giordenello v. U.S., 357 U.S. 480

"The right to labor and to enjoy its protection from unlawful interference is a constitutional as well as a common-law right. Every man has a natural right to the

fruits of his own industry." 48 Am Jur 2d, Section 2, page 80.

"The liberty mentioned in that [14th] amendment means, not only the right of the citizen to be free from mere physical restraint of his person, as by incarceration, but the term is deemed to embrace the right of the citizen to be free in the enjoyment of all his faculties; to be free to use them in all lawful ways; to live and work where he will; to earn his livelihood by any lawful calling; to pursue any livelihood or avocation, and for that purpose to enter into all contracts which may be proper, necessary, and essential to his carrying out to a successful conclusion the purpose above mentioned." Allgeyer v. Louisiana, 165 U.S. 578, at 589

SUMMARY

The appellant is not a lawyer, nor is attempting to be one. For this reason, his efforts to enforce his constitutionaly protected rights have been imperfectly presented, and will, by nature, continue to be imperfect.

The appellant knows the difference between direct and indirect taxes; and that Congress cannot lay a direct tax without apportionment; and that indirect taxes are in the form of excises.

"A tax laid upon the happening of an event, as distinguished from its tangible fruits, is an indirect tax..."
Tyler v. U.S., 281 U.S. 497, at 502

The appellant has not engaged in activities that are taxable for revenue purposes. He is not subject to the I.R. Code. In the narrow perspective of the I.R. Code, he is a NONTAXPAYER.

"The revenue laws are a code or system in regulation of tax assessment and collection. THEY RELATE TO TAXPAYERS, AND NOT TO NONTAXPAYERS. The latter are without their scope. NO PROCEDURE IS PRESCRIBED FOR NONTAXPAYERS. and NO attempt is made to ANNUL any of their RIGHTS and remedies in due course of law. With them Congress does not assume to deal, and they are neither of the SUBJECT nor of the OBJECT of the revenue laws." (emphasis added)
Long v. Rasmussen, 281 F. 236, at 238
Economy Plumbing and Heating v. U.S., 470 F.2d 585, at 589.

The Pollack and Brushaber cases are still binding law upon the courts, and upon the appellee. At the time these cases were decided, it was possible to be engaged in an activity that was taxable for revenue

purposes, AND ALSO to have INCOME.

Since that time, MONEY has been removed from circulation, and it is no longer possible to have INCOME. The appellant could not, and therefore did not, have INCOME.

The appellant was not, and is not, subject to the Internal Revenue laws.

CONCLUSION

The lower court erred in assuming a jurisdiction that it did not possess; trying the case; and imposing an illegal sentence.

This court erred in affirming that illegal sentence.

Dated: June 19, 1986

/S/

LOUIS J. ZUGER
APPELLANT
WILKES ROAD
DANBURY, CT 06811

UNITED STATES COURT OF APPEALS
FOR THE SECOND CIRCUIT

At a stated Term of the United States Court of Appeals for the Second Circuit, held at the United States Courthouse in the City of New York, on the 5th day of September one thousand nine hundred and eighty-six.

Present:

HON. IRVING R. KAUFMAN,
HON. LAWRENCE W. PIERCE,
HON. ROGER J. MINER,
Circuit Judges,

LOUIS J. ZUGER, Plaintiff-Appellant	¶	
v.	¶	NO. 86-1116
UNITED STATES OF AMERICA Defendant-Appellee	¶	

A petition for rehearing having been filed herein by the Plaintiff-Appellant, Louis J. Zuger, pro-se,

Upon consideration thereof, it is

ORDERED that said petition be and it hereby is denied.

(signed)
Elaine B. Goldsmith
Clerk

UNITED STATES COURT OF APPEALS
FOR THE SECOND CIRCUIT

LOUIS J. ZUGER APPELLANT, vs. UNITED STATES OF AMERICA, APPELLEE.	)	DOCKET NO. 86-1116

PETITION FOR REHEARING

The appellant, LOUIS J. ZUGER, hereby petitions the court for rehearing of the above-captioned case which resulted in the summary denial of rehearing on September 5, 1986. The reason for rehearing is that the order of June 6, 1986 clearly misrepresents and misinterprets the appellant's position, arguments, and the law, and rehearing did not address these issues in any way.

Attached hereto and made a part hereof, is a copy of the order denying rehearing, as well as the petition for

rehearing dated June 19, 1986 and its exhibits.

Dated: September 10, 1986

/S/

LOUIS J. ZUGER
APPELLANT
WILKES ROAD
DANBURY, CT 06811

UNITED STATES COURT OF APPEALS
SECOND CIRCUIT
UNITED STATES COURTHOUSE
FOLEY SQUARE
NEW YORK 10007

ELAINE B. GOLDSMITH
Clerk

September 16, 1986

Louis J. Zuger
Wilkes Road
Danbury, CT 06811

RE: USA V Zuger
Docket Number: 86-1116

Dear Mr. Zuger:

Please be advised that pursuant to Rule 40 of Federal Rules of Appellate Procedure, you may file only one Petition for Rehearing per case. However, you have sixty (60) days from the date of the Order dated September 5, 1986, of the Court of Appeals for the Second Circuit, to file a Petition for Writ of Certiorari to the Supreme Court in Washington, DC.

Very truly yours,
ELAINE B. GOLDSMITH
CLERK

(signed) ??

BY: JONNE' JAMES
Assistant Clerk

jj/Encl.

LOUIS J. ZUGER
Wilkes Road
Danbury, CT 06811
September 24, 1986

Office of the Clerk
United States Court of Appeals
For the Second Circuit
United States Courthouse
Foley Square
New York, N.Y. 10007

Attention: ELAINE B. GOLDSMITH, Clerk.

Re: USA v. Zuger
Docket Number 86-1116

Dear Mrs. Goldsmith:

I have your letter of September 16, 1986, and must reject your premise, for the following reasons:

1. I am not a licensed, enfranchised lawyer, so I have never contracted to abide by the Federal Rules of Appellate Procedure.

2. Contrary to your letter, there is nothing in Rule 40, FRAP, that limits the number of rehearings, or prohibits more than one rehearing.

3. The "Rules" were established in pursuance of 28 USC §2072, and §2072 clearly indicates the intent of Congress that said rules may not abridge, enlarge or modify any substantive right. The appellant has the right to a determination by the court, and the court has failed to inform him of the basis of their decision. For this reason, rehearing is a necessary preliminary to going to the Supreme Court on either direct appeal or certiorari.

4. The petition, as submitted, does comply with Rule 40 insofar as it does

"state with particularity the points of law or fact which in the opinion of the petitioner the court has overlooked or misaprehended and shall contain such argument in support of the petition as the petitioner desires to present."

Accordingly, the enclosed petition for rehearing, which had been timely filed, is returned for rehearing. Please refrain from making judicial determinations and allow the judges to do their job.

Thanking you for your cooperation, I am,

Very truly yours,

(signed)

Louis J. Zuger
Appellant.

UNITED STATES COURT OF APPEALS
FOR THE SECOND CIRCUIT

LOUIS J. ZUGER, APPELLANT,	
vs.	DOCKET NO. 86-1116
UNITED STATES OF AMERICA, APPELLEE.	

NOTICE OF INTENT

The appellant, LOUIS J. ZUGER, hereby gives notice that he rejects the unlawful return of his rehearing petitions by the Chief Clerk of this Court, and that he intends to petition the Supreme Court of the United States for a writ of mandamus ordering her to accept and process re-rehearing as filed, so that he may ultimately obtain an appealable order from this Court.

Dated: October 30, 1986

/S/

LOUIS J. ZUGER
APPELLANT
WILKES ROAD
DANBURY, CT 06811